

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA**

SATCOMM,

Petitioner,

vs.

Case 5:19-mc-00010-MTT

**PAYPAL, and
DANIEL H. SCHULMAN,**

Respondents.

STATEMENT OF ATTORNEYS' FEES

Respondents, PAYPAL, INC. (incorrectly identified in Petitioner's filings as "PayPal Holding Corporate" and "PayPal, LLC") and DANIEL H. SCHULMAN (collectively, "Respondents" or "PayPal"), pursuant to the directions of the Court as set forth in its Order entered April 1, 2020 [Dkt. 17], files their Statement of Attorneys' Fees incurred due to Petitioner SATCOMM's frivolous attempt to gain the Court's confirmation of a purported arbitration award.

As shown by the Declaration of Amy L. Hanna Keeney, attached hereto as **Exhibit A**, and the Declaration of Lyndsey C. Heaton, attached hereto as **Exhibit B**, and the invoices attached thereto, Respondents' counsel has been forced to incur \$28,507.00 in defending against SATCOMM's frivolous litigation.

Accordingly, Respondents respectfully requests that the Court (1) enter an order awarding Respondents \$28,507.00 in attorneys' fees and costs to be paid by SATCOMM; and (2) direct SATCOMM to make full payment to Respondents' undersigned counsel within 30 days of the entry of that order.

Respectfully submitted this 24th day of April, 2020.

ADAMS AND REESE LLP

/s/ Amy L. Hanna Keeney

Amy L. Hanna Keeney

Georgia Bar No.: 509069

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Counsel for Respondents

CERTIFICATE OF SERVICE

I, Amy L. Hanna Keeney, certify that the foregoing document has been filed with the Court and served electronically via this Court's CM/ECF System upon registered users and/or via First Class U.S. Mail upon the following:

*SATCOMM
18249 East Veterans Memorial Drive
Suite 8174
Bonney Lake, WA 98391*

This 24th day of April, 2020.

ADAMS AND REESE LLP

/s/ Amy L. Hanna Keeney
Amy L. Hanna Keeney
Georgia Bar No. 509069
Counsel for Respondents